REMARKS

With the present Amendment, Applicants address the rejections of the outstanding Office Action mailed March 10, 2005. Favorable reconsideration of this patent application, as presently amended and in light of the following discussion, is respectfully requested.

The Specification stands objected to because the serial numbers of the co-pending applications need to be updated. Applicants have amended the Specification to reflect the serial numbers and status of the co-pending applications.

Independent claim 29 and dependent claims 30-35 and 40-44 stand rejected under 35 U.S.C. §102(e) as being anticipated by Ludwig (USPN 6,816,904).

Dependent claims 45-60 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Ludwig.

Independent claims 1 and 61 and dependent claims 2-28, 36-39 and 62 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Ludwig in view of Blumel (USPN 6,859,610).

With this Amendment, independent claim 1 has been amended to more specifically recite the elements of the claimed invention. Specifically, the preamble of claim 1 now recites an application programming interface for handling interaction with an audio/video filing system capable of handling and organizing audio/video data. As noted by the Examiner, Ludwig also recites an application programming interface, or API. API's are well known in the field of computer hardware and software and it is not unusual that an API would be present in a complex audio/visual system such as is described in Ludwig. It is important to note, however, that the API discussed at column 10, line 4, relates to A/V video network manager 34 and does not handle the interaction with the audio/video filing system. Thus, the Ludwig API is not analogous to the present invention.

It is also important to note that Ludwig fails to disclose or suggest the novel features of the present invention. Specifically, as noted in the present application A/V data and non-A/V data are fundamentally different and handling both A/V and non-A/V

data in prior art systems is inherently inefficient. See paragraph 6 in the present application. To the extent Ludwig recognizes that A/V and non-A/V have different attributes, they rely on the use of separate networks for distributing different data types. For example, Ludwig teaches that it is preferable to have a data network 20 for handling digital data and an A/V network 30 for handling analog audio/video data. See for example, column 10 at line 18. Ludwig recognized there was a problem with delivering real-time A/V but failed to recognize the advantages taught by the present invention where the file server is adapted to efficiently handle both A/V data and non-A/V data. Therefore, the Ludwig teaches a system that operates in a manner consistent with the prior art systems.

None of the elements identified in the Ludwig system alone or in combination achieves the novel features or functions of the present invention. For example, claim 1 as now amended specifically recites that the claimed API includes a first interface, which controls transfer of information between a first device (A/V controller) that handles both isochronous and asynchronous data. This important feature is not present in Ludwig's system and is not suggested in the rather voluminous disclosure.

Further still, Ludwig does not teach or otherwise suggest that the first device can select either a first set of functions to manipulate said audio/video filing system when a first file type is detected of a second set of functions to manipulate said audio/video filing system when a second file type is detected. Nor does Ludwig teach or otherwise suggest a second interface to control transfer of information between a second device capable of handling asynchronous data and said audio/video file system.

It is also noted that neither Ludwig nor Blumel, either alone or in combination, describe the use of an API to instruct the A/V file system to handle different types of data differently. Neither reference addresses these problems nor the inefficiencies associated at the audio/video file system. With the present invention, disk access is optimized because different data types may be accessed in the most efficient manner.

Since claims 1, 29 and 61 each distinctly claim the novel features of the present invention, each independent claim is now believed to be in allowable condition. Further, dependent claims 2-10, 13-28, 29-60 and 62 which depend from the independent

claims are also believed to be in allowable condition. Thus, Applicants respectfully submits that all pending claims are patentably distinct from the prior art and are now allowable because the claims particularly point out and distinctly claim the subject matter that Applicants regard as their invention. Reconsideration of the rejections is respectfully requested. Allowance of the pending claims, as now amended, at an early date is earnestly solicited.

If an extension of time to reply to the Office Action under 37 CFR 1.136(a) is required, Applicants hereby provisionally request such additional extension. Any additional charges for this extension of time may be charged to Deposit Account No. 503000.

Respectfully submitted,

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